

1 GUNDERSON LAW FIRM  
2 Catherine A. Reichenberg, Esq.  
3 Nevada State Bar No. 10362  
4 creichenberg@gundersonlaw.com  
5 3895 Warren Way  
6 Reno, Nevada 89509  
7 Telephone: 775.829.1222  
8 Facsimile: 775.829.1226  
9 *Attorney for Cherrie Bailey, an  
Individual dba Ponderosa Saloon,*

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

BROADCAST MUSIC, INC.; HOUSE OF  
CASH, INC.; PEERMUSIC III LTD.; RIO  
BRAVO MUSIC, INC.; and RONDOR MUSIC  
INTERNATIONAL, INC., d/b/a IRVING  
MUSIC,

3:22-cv-00157-MMD-CSD

STIPULATION FOR EXTENSION  
OF TIME TO RESPOND TO  
COMPLAINT

(FIRST REQUEST)

Plaintiffs,

vs.

CHERRIE BALEY, an individual d/b/a  
PONDEROSA SALOON,

Defendant.

/

IT IS HEREBY STIPULATED, by and between Plaintiffs BROADCAST MUSIC, INC.;  
HOUSE OF CASH, INC.; PEERMUSIC III LTD.; RIO BRAVO MUSIC, INC.; and RONDOR  
MUSIC INTERNATIONAL, INC., d/b/a IRVING MUSIC (collectively, "Plaintiffs"), by and through  
their counsel Michelle D. Alarie, Esq., Armstrong Teasdale, LLP., and by Defendant CHERRIE  
BALEY, an individual d/b/a PONDEROSA SALOON ("Defendants"), by and through her counsel,  
Catherine A. Reichenberg, Esq., Gunderson Law Firm, that the time allowed for Defendants to respond  
to the Plaintiffs' Complaint shall be extended up to 45 days, ending on and including June 17, 2022.

1 The Complaint and Summons were served April 12, 2022. This request for an extension of  
2 time is made before the expiration of any deadline to answer or otherwise respond to the Complaint  
3 by the Defendant.

4 Good cause exists for this extension as the parties are engaged in early settlement discussions  
5 in an effort to resolve the matter short of further litigation. Accordingly, counsel for all parties agree  
6 to extend the time for the Defendants to answer or otherwise respond to the Complaint through June  
7 17, 2022.

DATED this 26th day of April, 2022.

GUNDERSON LAW FIRM

/s/ Catherine A. Reichenberg, Esq.

---

GUNDERSON LAW FIRM

Catherine A. Reichenberg, Esq.

Nevada State Bar No.: 10362

*Attorney for Cherrie Bailey, an individual  
d/b/a Ponderosa Saloon*

DATED this 26th day of April, 2022.

ARMSTRONG TEASDALE LLP

/s/ *Michelle D. Alarie, Esq.*

---

ARMSTRONG TEASDALE LLP

Michelle D. Alarie, Esq.

Nevada State Bar No.: 11894

*Attorney for Broadcast Music, Inc., House of Cash, Inc., Peermusic III Ltd, Rio Bravo Music, Inc., and Rondor Music International, Inc., dba Irving Music*

11

8 | //

1                   **ORDER EXTENDING TIME TO FILE RESPONSIVE PLEADING**

2                   **IT IS HEREBY ORDERED** that the Stipulation is approved; and

3                   **IT IS FURTHER ORDERED** that Defendants shall have up to and including June 17, 2022  
4 to answer or otherwise respond to Plaintiffs' Complaint;

5                   **IT IS ORDERED** this 27th day of April, 2022.

6  
7                   

8                   

---

UNITED STATES MAGISTRATE JUDGE

9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28